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August 3, 2007

## VIA ECF AND HAND DELIVERY

Honorable Paul A. Crotty United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

> Re: <u>United States v. Wanda Vasquez</u> Docket No. 07-Cr.352 (PAC)

Dear Judge Crotty:

My firm represents the defendant, Wanda Vasquez, in the above referenced matter. Presently, Ms. Vasquez is at liberty pursuant to a personal recognizance bond, under the supervision on the United States Pre Trial Services Agency of the Southern District of New York. As part of her conditions of release, Ms. Vasquez's travel restrictions do not allow her to travel outside of the Southern and Eastern Districts of New York. My client respectfully requests that the conditions of her release be temporarily modified to permit her to travel to Puerto Rico, from August 8, 2007 to August 14, 2007. Ms. Vazquez, along with her two children, will be visiting her father and stepmother, in Puerto Rico.

Ms. Vasquez has previously received permission from her Pre-Trial Services Officer, John Moscatto, to travel to Puerto Rico. Ms. Vasquez has already provided her itinerary and the specific details of her trip to Officer Moscatto. On Tuesday July 31, 2007, I received a voice message, from Officer Moscatto, stating that he has granted permission for my client to travel to Puerto Rico, from August 8, 2007 through August 14, 2007. In addition, AUSA William Harrington has informed me that he does not have any objections to amending my client's travel restrictions, so long as the Pre Trial Services Department has approved her travel plans.

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During her time in Puerto Rico, Ms. Vasquez plans to reside with her father, Francisco Vasquez, and her stepmother, Conchita Santana. Ms. Vasquez's father and stepmother maintain a residence at *Carr. 30 Km 11.1 Barrie Pena Pobre Naguabe*, *Puerto Rico*, with a mailing address of *P.O. Box 330*, *Rio Blanco*, *Puerto Rico 00719*. In addition, Mr. Vasquez's residence can be reached via telephone, at (787) 874-2131.

Ms. Vasquez is hopeful that Your Honor will permit this travel to Puerto Rico, in order to afford her the opportunity to visit her grandfather. We therefore ask Your Honor to modify the conditions of her post-release supervision so that Ms. Vasquez will temporarily be permitted to travel outside the continental United States, to Puerto Rico, commencing on August 8, 2007, and ending August 14, 2007.

In the event that this request is granted, or if this request cannot for some reason be fulfilled, please have Your Honor's staff contact me at (212) 732-0002.

Respectfully submitted,

Mark I. Cohen, Esq.